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PROPOSED COUNSEL FOR DEBTOR  
AND DEBTOR IN POSSESSION  
MODE ELEVEN BANCORP

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF WYOMING**

In re:	)	
	)	Chapter 11
MODE ELEVEN BANCORP,	)	
	)	Case No. 25-20240
	)	
Debtor in Possession	)	

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**NOTICE PURSUANT TO LOCAL BANKRUPTCY RULE 2002-1 OF  
MODE ELEVEN BANCORP'S MOTION FOR ENTRY OF AN ORDER (I)  
APPROVING THE BIDDING PROCEDURES; (II) APPROVING BID  
PROTECTIONS; (III) APPROVING PROCEDURES FOR ASSUMPTION AND  
ASSIGNMENT OF CERTAIN EXECUTORY CONTRACTS AND RELATED  
NOTICES; (IV) SCHEDULING THE BID DEADLINE, THE AUCTION AND  
SALE HEARING; (V) APPROVING THE FORM AND MANNER OF NOTICE  
THEREOF; AND (VI) GRANTING RELATED RELIEF, THE HEARING  
THEREON AND OPPORTUNITY TO OBJECT**

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**YOU ARE HEREBY NOTIFIED** that on June 18, 2025, Mode Eleven Bancorp  
(the "Debtor") filed its DEBTOR'S MOTION FOR ENTRY OF AN ORDER (I)

APPROVING THE BIDDING PROCEDURES; (II) APPROVING BID PROTECTIONS; (III) APPROVING PROCEDURES FOR ASSUMPTION AND ASSIGNMENT OF CERTAIN EXECUTORY CONTRACTS AND RELATED NOTICES; (IV) SCHEDULING THE BID DEADLINE, THE AUCTION AND SALE HEARING; (V) APPROVING THE FORM AND MANNER OF NOTICE THEREOF; AND (VI) GRANTING RELATED RELIEF [Doc. 28] (the “Bid Procedures Motion”) wherein the Debtor seeks an order approving proposed bidding procedures for the sale of substantially all of the Debtor’s assets (the “Sale”), (ii) approving certain bid protections in the event that a stalking horse bidder is designated by the Debtor (the “Bid Protections”), (iii) establishing procedures for assumption and assignment of certain executory contracts and related notices, (iv) scheduling the bid deadline, auction, if any, and sale hearing, (v) approving the form and manner of notice thereof, and (vi) granting related relief.

**YOU ARE FURTHER NOTIFIED** that pursuant to Rule 2002-1 of the Local Rules of Bankruptcy Procedure and the attached *Order Approving Debtor’s Ex-Parte Motion to Shorten Notice Period for Forthcoming Motion* [Doc. 32-1], if you desire to oppose the Bid Procedures Motion filed with the Court on behalf of the Debtor, you are required to file with the Court and serve on Abigail V. O’Brien and Bradley T. Hunsicker, attorneys for the Debtor, whose addresses are shown above, a written objection to either of the Bid Procedures Motion on or before **July 7, 2025**, or the relief requested may be granted by the Court without further notice or hearing.

**PLEASE TAKE NOTICE THAT** the United States Bankruptcy Court for the District of Wyoming (the “Court”) has scheduled a hearing (the “Hearing”) for **July 10**,

**2025 at 10:30 a.m. (Prevailing Mountain Time)** to consider the Bid Procedures Motion. The Hearing will be held in the United States Bankruptcy Courtroom, 2120 Capitol Avenue, 8th Floor, Cheyenne, Wyoming.

A party requesting participation by video conferencing shall refer to Local Bankruptcy Rule 9074-2 and file a request for participation by video conferencing on or before **July 7, 2025**.

**YOU ARE FURTHER NOTIFIED** that if you do not have a copy of the Bid Procedures Motion, the Bid Procedures Motion is available for public inspection from 8:30 a.m. to 12:00 p.m. and 1:00 p.m. to 4:00 p.m. during any regular business day in the Clerk's Office of the U.S. Bankruptcy Court for the District of Wyoming, 2120 Capitol Avenue, 6<sup>th</sup> Floor, Cheyenne, Wyoming 82001. Additionally, a copy of the Bid Procedures Motion may be obtained upon written request via email to [aobrient@cov.com](mailto:aobrient@cov.com) and [bhunsicker@markuswilliams.com](mailto:bhunsicker@markuswilliams.com) with the following in the subject line: "Mode Eleven Bid Procedures Motion." A copy of the Bid Procedures Motion or any other pleadings filed in the case may also be obtained by accessing the Court's PACER and ECF systems.

Dated: June 23, 2025  
Cheyenne, Wyoming

COVINGTON & BURLING LLP

By: /s/ Abigail V. O'Brient

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Proposed Counsel for the Debtor and Debtor in  
Possession